



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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September 11, 2017

**VIA ECF & FIRST CLASS MAIL**

Honorable William F. Kuntz  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Alleyne, et al. v. P.O. Rahman, et al.,  
15-CV-01860 (WFK)(VMS)

Your Honor:

I am an Assistant Corporation Counsel and the attorney assigned to the defense of the above-referenced matter. Defendants write to respectfully request a seven (7) day extension of time from September 11, 2017 to and including September 18, 2017, to serve their motion for summary judgment. This is defendants' second request for an extension of time to serve their motion for summary judgment. Plaintiff consents to this request.<sup>1</sup>

By way of background, on June 5, 2017, the Court granted defendants' application to make a motion for summary judgment. On August 8, 2017, the Court granted defendants' first extension of time to file their summary judgment motion due to the undersigned's scheduling issues during the month of August. Defendants now request a brief extension of time to finalize their motion papers.

In light of the foregoing, defendants respectfully request a seven (7) day extension of time from September 11, 2017 to and including September 18, 2017 to serve their motion for summary judgment. Should the Court be inclined to grant this request, defendants propose the following revision to the current briefing schedule: defendants shall serve their motion on or before September 18, 2017; plaintiff shall serve his opposition, if any, on or before November 6,

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<sup>1</sup> The undersigned apologizes for the belatedness of this request, which was due to an inadvertent failure by the undersigned to file the instant letter when it was originally drafted on September 7, 2017.

2017; and defendants shall serve their reply, if any, and file all motions papers and provide courtesy copies thereof to the Court on or before December 4, 2017.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/

ALEXANDER NOBLE  
*Assistant Corporation Counsel*  
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cc: Robert Marinelli, Esq. *(By ECF & Email)*  
Juliene Munar, Esq. *(By ECF & Email)*